

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	No. 4:18 CR 459 CDP (JMB)
)	
DIANRONG JIANG,)	
)	
Defendant.)	

MOTION FOR PRE-TRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Kenneth R. Tihen, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the Government states as follows:

1. Defendant is charged with the harboring of illegal aliens pursuant to Title 8 United States Code Section 1324 (a).
2. Pursuant to Title 18, United States Code, Section 3142(g),
 - (a) the weight of the evidence against defendant;
 - (b) defendant's history and characteristics including but not limited to defendant being an illegal alien; and
 - (c) the nature and seriousness of the danger to any person or the community that would

be posed by defendant's release warrant defendant's detention pending trial.

Additionally,

3. There is a serious risk that the defendant will flee.
4. The defendant is a threat to the community.
5. There is a serious risk that the defendant will obstruct or attempt to obstruct justice, or threaten, injure or intimidate, or attempt to threaten, injure or intimidate a prospective witness or juror.

WHEREFORE, there are no conditions or combination of conditions that will reasonably assure defendant's appearance as required and the safety of any other person and the community and the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

JEFFREY B. JENSEN
UNITED STATES ATTORNEY

/s/Kenneth R. Tihen
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CERTIFICATE OF SERVICE

I hereby certify that on June 4, 2018, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.

s/ Kenneth R. Tihen
Assistant United States Attorney

